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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

10 * * * *

11 **UNITED STATES OF AMERICA**)

12 **Plaintiff,**)

13 **v.**)

CASE NO: 2:15-cr-285-APG-PAL

14 **CHARLES BURTON RITCHIE, and**)

15 **BENJAMIN GALECKI,**)

16 **a/k/a ZENCENSE BEN**)

17 **RYAN MATTHEW EATON,**)

18 **Defendant.**)

**STIPULATION TO CONTINUE
STATUS CONFERENCE HEARING
[PROPOSED ORDER]**

19 **IT IS HEREBY STIPULATED and AGREED** by and between James E. Keller, Assistant
20 United States Attorney, Charles Anthony Miracle, U.S. Department of Justice, Cole Arnold
21 Radovich, U.S. Department of Justice, David Z Chesnoff, Esq., and Richard A. Schonfeld, attorney
22 for Defendant, Benjamin Galecki, John Lloyd Snook, III, Esq., attorney for Defendant, Charles
23 Burton Ritchie, and Shawn R. Perez, Esq., attorney for Defendant, Ryan Matthew Eaton, that the
24 Status Conference hearing currently scheduled for May 17, 2018 at the hour of 11:00 a.m. be
25 **VACATED and RESET** to July 17, 2018 at 11:00 a.m. or a time thereafter convenient to the Court.
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1 This Stipulation is entered into for the following reasons:

2 1. That counsel for Defendant, Benjamin Galecki has a scheduling conflict;

3 2. That the United States Court of Appeal for the Fourth Circuit, argument related to
4 Defendant Benjamin Galecki and Burton Ritchie's Virginia convictions took place last week. The
5 parties believe it is helpful to know the result of that appeal prior to the status conference.
6

7 3. That counsel for Defendant, Benjamin Galecki has been in communication with
8 Assistant United States Attorney Charles Miracle and there is no objection to the continuance as
9 outlined above;

10 4. That the Defendants are in custody and do not object to the continuance;

11 5. That the US Marshall's shall not transport Defendants, Benjamin Galecki and Burton
12 Ritchie from Talladega, Alabama to this hearing;

13 6. Additionally, denial of this request for a continuance would result in a miscarriage
14 of justice;
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16 7. For the above-stated reasons, the ends of justice would best be served by a
17 continuance of said hearing;
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1 8. The additional time requested in this Stipulation is excludable in computing the time
2 within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States
3 Code, Sections 3161(h)(1)(D) and 3161(h)(7)(A) when considering the factors under Title 18, United
4 States Code, Sections 3161(h)(7)(B)(I) and 3161(h)(7)(B)(iv);

5 **DATED** this ____ day of May, 2018.

6
7 **UNITED STATES ATTORNEY**

CHESNOFF & SCHONFELD

8 _____
 /s/
9 **JAMES E. KELLER, AUSA**
10 100 West Liberty
11 Reno, Nevada 89501
12 Attorney for Plaintiff

 /s/
13 **DAVID Z. CHESNOFF, ESQ.**
Nevada Bar No. 2292
14 **RICHARD A. SCHONFELD, ESQ.**
Nevada Bar No. 6815
15 520 South Fourth Street
16 Las Vegas, Nevada 89101
17 Attorney for Defendant,
Benjamin Galecki

18 _____
 /s/
19 **COLE RADOVICH / Trial Attorney**
20 Narcotic and Dangerous Drug Section
21 Criminal Division / U.S. Department of Justice
22 145 N Street NE / Second Floor, East Wing
23 Washington D.C. 20530

24 _____
 /s/
25 **JOHN LLOYD SNOOK, III**
26 Snoot & Haughey, P.C.
408 East Market Street, Suite 107
Charlottesville, Virginia 22902
Attorney for Defendant, Charles Burton Ritchie

 /s/
27 **SHAWN R. PEREZ, ESQ.**
Law Office of Shawn R. Perez
28 626 Third Street
29 Las Vegas, Nevada 89101
30 Attorney for Defendant, Ryan Eaton

ORDER

IT IS HEREBY ORDERED that the Status Conference hearing of the within matter currently scheduled for May 17, 2018 at the hour of 11:00 a.m. shall be **VACATED** and **RESET** to August 7, 2018 at the hour of 10:00 a.m. in Courtroom 6C.

IT IS ORDERED that the US Marshall's shall not transport the Defendants, Benjamin Galecki and Burton Ritchie from Talladega, Alabama to this hearing.

IT IS FURTHER ORDERED that the additional period of time granted pursuant to this Order is determined to be excludable and excluded under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(1)(D), and 3161(h)(7)(A).

IT IS SO ORDERED.

DATED this 14th day of May, 2018.


UNITED STATES DISTRICT JUDGE

Submitted by:

/s/
RICHARD A. SCHONFELD, ESQ.